

**Exhibit A**

**Proposed Order**

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et*  
*al.*,

Debtors.<sup>1</sup>

PROMESA

Title III

No. 17 BK 3283-LTS

(Jointly Administered)

This filing relates to the  
Commonwealth and ERS.

**ORDER GRANTING FOUR HUNDRED THIRTY-SIXTH OMNIBUS OBJECTION (NON-  
SUBSTANTIVE) OF THE COMMONWEALTH OF PUERTO RICO AND THE  
EMPLOYEES RETIREMENT SYSTEM OF THE GOVERNMENT OF THE  
COMMONWEALTH OF PUERTO RICO TO SUBSEQUENTLY AMENDED CLAIMS**

Upon the *Four Hundred Thirty-Sixth Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico and the Employees Retirement System of the Government of the Commonwealth of Puerto Rico to Subsequently Amended Claims* [ECF No. 20494] (the “Four Hundred Thirty-Sixth Omnibus Objection”),<sup>2</sup> filed by the Commonwealth of Puerto Rico

<sup>1</sup> The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the “Commonwealth”) (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”, and together with the Commonwealth, COFINA, HTA, ERS, and PREPA, the “Debtors”) (Bankruptcy Case No. 19-BK-5532-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

<sup>2</sup> Capitalized terms not otherwise defined herein shall have the meanings given to such terms in the Four Hundred Thirty-Sixth Omnibus Objection.

(“Commonwealth”) and the Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS,” and together with the Commonwealth, the “Debtors”), dated April 1, 2022, for entry of an order disallowing in their entirety certain claims filed against the Debtors, as more fully set forth in the Four Hundred Thirty-Sixth Omnibus Objection and supporting exhibits thereto; and the Court having jurisdiction to consider the Four Hundred Thirty-Sixth Omnibus Objection and to grant the relief requested therein pursuant to PROMESA section 306(a); and venue being proper pursuant to PROMESA section 307(a); and due and proper notice of the Four Hundred Thirty-Sixth Omnibus Objection having been provided to those parties identified therein, and no other or further notice being required; and each of the claims identified in the column titled “Claims to be Disallowed” in Exhibit A to the Four Hundred Thirty-Sixth Omnibus Objection (collectively, the “Claims to Be Disallowed”) having been amended and superseded by the subsequently filed proofs of claim identified in the column titled “Remaining Amended Claims” in Exhibit A (collectively, the “Remaining Amended Claims”); and the Court having determined that the relief sought in the Four Hundred Thirty-Sixth Omnibus Objection is in the best interest of the Debtors, their creditors, and all the parties in interest; and the Court having determined that the legal and factual bases set forth in the Four Hundred Thirty-Sixth Omnibus Objection establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor, it is

ORDERED that the Four Hundred Thirty-Sixth Omnibus Objection is GRANTED as set forth herein; and it is further

ORDERED that the Claims to Be Disallowed are hereby disallowed in their entirety; and it is further

ORDERED that the Debtors' right to object to the Remaining Amended Claims is reserved; and it is further

ORDERED that Kroll is authorized and directed to designate the Claims to Be Disallowed as expunged on the official claims register in the Title III Cases; and it is further

ORDERED that this Order resolves Docket Entry No. 20494 in Case No. 17-3283; and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation, or enforcement of this Order.

SO ORDERED.

Dated: \_\_\_\_\_

\_\_\_\_\_  
Honorable Judge Laura Taylor Swain  
United States District Judge

**EXHIBIT A**

**Schedule of Claims Subject to Four Hundred Thirty-Sixth Omnibus Objection**

Four Hundred Thirty-Sixth Omnibus Objection  
Exhibit A - Claims to Be Disallowed

CLAIMS TO BE DISALLOWED

REMAINING AMENDED CLAIMS

	NAME	DATE FILED	CASE NUMBER / DEBTOR	CLAIM #	CLAIM AMOUNT	NAME	DATE FILED	CASE NUMBER / DEBTOR	CLAIM #	CLAIM AMOUNT
1	ALICEA HERNANDEZ, JUAN M HC-01 BOX 5352 COROZAL, PR 00783	07/02/18	17 BK 03566-LTS / Employees Retirement System of the Government of the Commonwealth of Puerto Rico	138556	Undetermined*	ALICEA HERNANDEZ, JUAN MANUEL HC-01 BOX 5352 COROZAL, PR 00783	06/08/21	17 BK 03283-LTS / Commonwealth of Puerto Rico	179341	\$ 129,000.00
	Reason: Amended and superseded by a later filed Proof of Claim.									
2	CINTRON MORALES, RADAMES CALLE GUANAJIBO 154 URB PROVINCIO DEL RIO COAMO, PR 00769	06/26/18	17 BK 03283-LTS / Commonwealth of Puerto Rico	97605	Undetermined*	CINTRON MORALES, RADAMES 154 CALLE GUANAJIBO PROVINCIA DEL RIO COAMO, PR 00769	09/27/19	17 BK 03283-LTS / Commonwealth of Puerto Rico	171179	\$ 35,000.00*
	Reason: Amended and superseded by a later filed Proof of Claim.									
3	COLON RIVERA, KATTY HC-01 BOX 2214 MOROVIS, PR 00687	06/28/18	17 BK 03283-LTS / Commonwealth of Puerto Rico	69397	\$ 9,800.00	COLON RIVERA, KATTY HC 01 BOX 2214 MOROVIS, PR 00687	11/25/19	17 BK 03283-LTS / Commonwealth of Puerto Rico	172579	\$ 9,800.00*
	Reason: Amended and superseded by a later filed Proof of Claim.									
4	CRUZ SANTIAGO, NEFTALI PO BOX 2011 ARECIBO, PR 00613-2011	06/29/18	17 BK 03566-LTS / Employees Retirement System of the Government of the Commonwealth of Puerto Rico	123694	Undetermined*	CRUZ SANTIAGO, NEFTALI PO BOX 2011 ARECIBO, PR 00613	03/24/21	17 BK 03566-LTS / Employees Retirement System of the Government of the Commonwealth of Puerto Rico	179156	\$ 48,420.65
	Reason: Amended and superseded by a later filed Proof of Claim.									
5	FIGUEROA TORRES, MARIA 864 COM CARACOLLES 1 PENUELAS, PR 00624- 2505	06/21/18	17 BK 03283-LTS / Commonwealth of Puerto Rico	75859	Undetermined*	FIGUEROA TORRES, MARIA C. ANESSA HERNANDEZ RODRIGUEZ, ESQ 4140 AURORA STREET SUITE 1 PONCE, PR 00717-1203	06/02/21	17 BK 03283-LTS / Commonwealth of Puerto Rico	179281	\$ 63,235.80*
	Reason: Amended and superseded by a later filed Proof of Claim.									

Four Hundred Thirty-Sixth Omnibus Objection  
Exhibit A - Claims to Be Disallowed

CLAIMS TO BE DISALLOWED

REMAINING AMENDED CLAIMS

NAME	DATE FILED	CASE NUMBER / DEBTOR	CLAIM #	CLAIM AMOUNT	NAME	DATE FILED	CASE NUMBER / DEBTOR	CLAIM #	CLAIM AMOUNT
6 MARTINEZ VELEZ, RUTH DALIA LUISA PMB 506 609 AV. TITO CASTRO SUITE 102 PONCE, PR 00716-0200	06/27/18	17 BK 03283-LTS / Commonwealth of Puerto Rico	104045	Undetermined*	LUISA MARTINEZ VELEZ, RUTH DALIA PMB 506 609 AVE. TITO CASTRO SUITE 102 PONCE, PR 00716-0200	07/14/20	17 BK 03283-LTS / Commonwealth of Puerto Rico	174260	\$ 7,200.00
Reason: Amended and superseded by a later filed Proof of Claim.									
7 MARTINEZ VELEZ, RUTH DALIA LUISA PMB 506 609 AVE. TITO CASTRO SUITE 102 PONCE, PR 00716-0200	06/27/18	17 BK 03283-LTS / Commonwealth of Puerto Rico	102983	Undetermined*	MARTINEZ VELEZ, RUTH DALIA LUISA PMB 506 609 AVE. TITO CASTRO SUITE 102 PONCE, PR 00716-0200	07/14/20	17 BK 03283-LTS / Commonwealth of Puerto Rico	174278	\$ 5,000.00
Reason: Amended and superseded by a later filed Proof of Claim.									
8 NAZARIO SANTIAGO, CARMEN DELIA VILLA DEL CARMEN KIL 19.5 CARRE 150 COAMO, PR 00769	06/28/18	17 BK 03566-LTS / Employees Retirement System of the Government of the Commonwealth of Puerto Rico	126242	Undetermined*	NAZARIO SANTIAGO, CARMEN D. BOX 769 COAMO, PR 00769	07/10/19	17 BK 03283-LTS / Commonwealth of Puerto Rico	169712	Undetermined*
Reason: Amended and superseded by a later filed Proof of Claim.									
9 RIVERA LEBRON, MAGDA G. HC - 63 BOX 3313 PATILLAS, PR 00723	06/29/18	17 BK 03283-LTS / Commonwealth of Puerto Rico	149862	Undetermined*	RIVERA, MAGDA G. HC-63 BOX 3313 PATILLAS, PR 00723	09/10/20	17 BK 03283-LTS / Commonwealth of Puerto Rico	175328	\$ 75,000.00
Reason: Amended and superseded by a later filed Proof of Claim.									
10 RODRIGUEZ RIOS, ANA DELIS BE-18 C/25A. URB. BAIROA CAGUAS, PR 00725	06/26/18	17 BK 03566-LTS / Employees Retirement System of the Government of the Commonwealth of Puerto Rico	162478	\$ 1,500.00*	RODRIGUEZ RIOS, ANA DELIS BE-18 CALLE 25A URB. BAIROA CAGUAS, PR 00725	06/29/18	17 BK 03283-LTS / Commonwealth of Puerto Rico	145154	\$ 5,000.00*
Reason: Amended and superseded by a later filed Proof of Claim.									